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Mr. Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave. SW  
Room 4008-So  
Ag Stop 0268  
Washington D.C. 20250

August 2, 2005

**Subject: TM-04-07 National Organic Program, Sunset Review**

Dear Mr. Neal:

In response to the USDA's request for public comment regarding the upcoming sunset review for substances that are allowed or prohibited in the production of organic agricultural products, Suterra LLC would like to offer the following observations.

Suterra LLC manufactures and distributes pheromone lures and insect traps that are used to monitor pest insects, as well as pheromone mating disruption products for direct control of specific Lepidopteran pests. Many of these products are actively used by organic growers in their efforts to protect valuable crops from insect damage. Pheromone products have become important parts of integrated pest management programs in organic, as well as conventional agriculture settings.

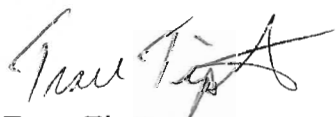
The National List of synthetic substances allowed for use in organic production contains several exemptions that are essential to the continued use of these worthy products on organic acreage. In regard to insect monitoring systems, Section 205.601(e)(7) allows for the use of insect traps. These traps are typically made of cardboard or plastic material, and are coated with a sticky substance that catches pest insects that are attracted to the species specific lure which is placed inside of them. After use, traps can be retrieved from the field or orchard. Section 205.601(f) allows for the use of pheromones as insect management. Pheromones are used as attractants within monitoring traps. The pheromones contained in monitoring lures are synthetically produced replicas of naturally occurring pheromone compounds that are produced by insects in nature. As such, they exhibit the same physical and chemical characteristics as pheromones emitted from insects that are found naturally in the field. They are of extremely low toxicity, and once released from the controlled release lures, are rapidly broken down by natural environmental processes. They do not remain in air, soil, water, or plants due to their natural volatility, and rapid UV light and oxidative degradation.

The continued exemption for insect traps and pheromones for insect management will allow organic growers to continue to use these important insect monitoring tools. Because these products are compatible with organic practices, are not harmful to human health or the environment, present no problems related to residues on harvested materials, or in the long range agro-ecosystem, and they provide growers with important information about target insect populations, their use under the National Organic Program should be continued.

Due to additional exemptions that are contained in Section 205.601, organic growers are also currently allowed to use hand-applied, "passive" pheromone dispensers in their efforts to directly control specific insect pests by disrupting their normal mating cycle. Section 205.601(f) allows for the use of the pheromone active ingredients that are contained in the dispensers. As described above, the pheromones used in these products are simply structurally and functionally identical, synthetic replicas of the pheromones which are naturally released by individual insect species. Section 205.601(m)(1) [along with Section 205.601(m)(2), which was subsequently added in 2003] allows for important inert materials to be included within "passive" pheromone dispensers. These dispenser materials allow for the economical application of pheromone to occur. They protect the vulnerable pheromone active ingredients from the rapid degradation that they would normally undergo if left unprotected in the natural field or orchard environment. With their use, pheromone active ingredients that would be degraded in hours or days, are protected, so that the effective period of use of these products is extended to several weeks or months. These inert materials present no significant harm to sustainable systems, including crops, soil or water.

Pheromone lures, insect traps and pheromone mating disruption products are valuable tools that organic growers use within many different cropping systems. This being the case, it is Suterra LLC's position that the National List exemptions mentioned above, Sections 205.601(e)(7), 205.601(f), 205.601(m)(1) and 205.601(m)(2), are serving their intended purpose to allow for the continued use of these suitable products on organic acreage, while preserving the integrity of organic agriculture. These types of important insect monitoring and control products can be used on organic acreage without harm to human health or the environment and their use is consistent with organic practices. Therefore, in our view, these particular exemptions should be carried out well beyond October, 2007 in order to continue to provide organic growers with viable options for insect pest monitoring and control that are entirely compatible with organic agriculture.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Trace Tipton", with a stylized flourish at the end.

Trace Tipton  
Regulatory Affairs  
Suterra LLC